

JOHNSTON BARTON PROCTOR & ROSE LLP
Max A. Moseley
569 Brookwood Village
Suite 901
Birmingham, AL 35209
Telephone: (205) 458-9400
Facsimile: (302) 458-9500

Counsel to Serra Chevrolet of Birmingham, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Chapter 11
)	
General Motors Corp., et al.,)	Case No. 009-50026 (REG)
)	
)	
Debtor.)	(Jointly Administered)
)	

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appear in the above-captioned case as counsel to SERRA Chevrolet of Birmingham, Inc. (“SERRA”), and pursuant to Federal Rules of Bankruptcy Procedure 2002 and 9010(b) and section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§101, *et seq.* (the “Bankruptcy Code”), demand that all notices given or required to be given and all papers served in this case be delivered to and served upon the parties identified below at the following address:

Max A. Moseley, Esq.
Johnston Barton Proctor & Rose LLP
569 Brookwood Village
Suite 901
Birmingham, AL 35209
Telephone: (205) 458-9414
Facsimile: (205) 458-9500
Email: mam@johnstonbarton.com

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

PLEASE TAKE FURTHER NOTICE that, this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive SERRA's (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which SERRA is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: Birmingham, Alabama
June 5, 2009

JOHNSTON BARTON PROCTOR & ROSE LLP

By: /S/ Max A. Moseley
Max A. Moseley, Esq.
Johnston Barton Proctor & Rose LLP
569 Brookwood Village
Suite 901
Birmingham, AL 35209
Telephone: (205) 458-9414
Facsimile: (205) 458-9500
Email: mam@johnstonbarton.com

COUNSEL TO SERRA CHEVROLET OF
BIRMINGHAM, INC.

Certificate of Service

I hereby certify that I have served the above and foregoing via electronic mail using the CM/ECF system, and via the United States Postal Service, first class mail in postage pre-paid envelopes, on this the 5th day of June, 2009, to the following:

Joseph R. Sgroi
Robert B. Weiss
Tricia A. Sherick
Honigman Miller Schwartz and Cohn LLP
2290 First National Building
660 Woodward Avenue
Detroit, MI 48226

Stephen Karotkin
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153

United States Trustee
33 Whitehall Street
21st Floor
New York, NY 10004

/s/ Max A. Moseley